

Other Comments:

"Digital copy protection, also referred to as digital rights management, seeks to prevent the unauthorized copying and redistribution of digital media." This flawed definition in first paragraph of the NOTICE OF PROPOSED RULEMAKING is enough to convince me of the faulty reasoning behind this proposal. Copy protection is not synonymous with digital rights management. It is one extreme form of digital rights management that is not nearly fine-grained enough to enable a wealth of opportunities for both content providers and content consumers. Any solution that ignores or encumbers making distinctions between fair use and no use, or doesn't offer a range of permitted and excluded uses for content is not only detrimental to the public, but also a disservice to the content provider. Invention and creativity no longer reside at just one point in the media creation and distribution pipeline. The consumer is also a producer, editor, critic, kibitzer, etc. The proposed •broadcast flag• not only erodes the consumer's ability to manipulate content for personal use, but it devalues content for the content provider by restricting its use to a narrow, predetermined set of applications, devices, and usage scenarios. It is a shortsighted measure being backed by an industry that is fighting change in consumer habits rather than embracing it.